



rec'd
8/5/91

STATE OF WEST VIRGINIA
DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES
WASTE MANAGEMENT SECTION
1356 Hansford Street
Charleston, West Virginia 25301
Telephone (304)348-5929

GASTON CAPERTON
Governor

J. EDWARD HAMRICK III
Director

August 5, 1991

ANN A. SPANER
Deputy Director

Ms. Pat Gaughan, 3HW62
EPA Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Dear Ms. Gaughan:

As discussed in my July 1, 1991 letter, Waste Management's Governor's Intern student employee has researched all conflicts/differences between HWIDEMS and our internal database and files. She has consolidated this information into the enclosed report. Also enclosed is documentation of each conflict. Should you need additional information to resolve these differences, let me know.

Thank you in advance for your assistance in rectifying this problem.

Sincerely,

A handwritten signature in cursive script, reading "Terrie Sangid".

Terrie Sangid
Technical Assistant
Compliance Monitoring and
Enforcement Office

TLS

Attachment

cc: Dennis Zielinski, Program Coordinator, EPA
Mike Dorsey, Asst. Chief, Waste Management
Max Robertson, Chief, Waste Management

Continued -- Facilities with a Name change Not Listed in HWIDEMS
(Name changes are presented by noting the previous name on first line, the current name on second line with EPA ID # on second line.) Documentation included.

Keeling & Smith Body Shop Smith's Auto & Truck Repair	WVD041191438
Kleenway Industries Markay Chemical Co	WVD981071684
K-Mart #3194 K-Mart #3198	WVD988770205
L.M. Love Hardware C.M. Love Hardware	WVD982679268
La Belle Plant Wheeling-Pittsburgh Steel	WVD039060983
Leslie Bros. Equipment Co Leslie Equipment Company	WVD045578929
Mean's Services, Inc Coyne Textile Services	WVD052574753
Morge Cleaners Norge Cleaning Village	WVD080727480
OMS #1 WVARNG-OMS #1	WVD981114978
OMS #2 WVARNG-OMS #2	WVD981114911
OMS #3 WVARNG-OMS #3	WVD981114796
OMS #4 WVARNG-OMS #4	WVD981114465

See WR DER change name of facility

HAZARDOUS WASTE DATA MANAGEMENT SYSTEM
MAINTENANCE FORM FOR NOTIFICATION

EPA-ID # WV:005:25:74:753: DATE: SEP 13 1991

FACILITY NAME Mear's Services, Inc.

New Facility Name
Coupe Service Services
Contact Person/Position

(Last, First, M) Title () Tel No.

MAILING Street

ADDRESS City State Zip

LOCATION Street

ADDRESS City State Zip

County Name County Code

Owner Name Operator Name

Activity code Used Oil Fuel Activities
___ Gen ___ Tr ___ Tsd ___ 6. Off-Spec Use Oil Fuel
___ 5. Market or Burn ___ A. Gen Mark to Burn
___ A. Gen Mark to Burn ___ B. Other Marketer
___ B. Other Marketer ___ C. Burner
___ C. Burner ___ 7. Spec Used Oil Fuel Mark

Waste Fuel Burn : Type of Coabustice Device
___ Utility Boiler ___ Ind. Boiler ___ Ind. Furnace

Mode of Transportation (Transporters Only)
___ Air ___ Rail ___ Highway ___ Water ___ Other

Maintanance Ser
W1 Card

F2 Card

Existing Waste Code	New Waste Code	Non-Reg Ind (e303)
_____	_____	_____
_____	_____	_____
_____	_____	_____

Gen

FY 1990 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

EPA ID: WV10105121517141715131

4. Data Entry

HANDLER NAME: Coyne Textile ServicesNew ☒ADDRESS: 1111 Vernon St. Huntington, WV 25704Update ☐DATE OF INITIAL EVALUATION WHICH IS
THE BASIS FOR THIS REPORT:6/25/915a. AGENCY RESPONSIBLE FOR
EVALUATION:
Put code in box5E = EPA
S = State
C = Contractor/EPAO = Other
B = Contractor/State
X = Oversight6. TYPE OF EVALUATION COVERED
BY THIS REPORT:

SELECT EVALUATION Type and insert in box:

11 = Compliance Eval. Inspection (CEI) 4 = Comp GWM Eval (CME)
2 = Sampling Inspection 5 = Compliance Sched. Eval
3 = Record Review 11 = Case Dev. Inspection
12 = OEM Inspection7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): / / 8a. Eval. Comments:

9. CLASS and VIOLATIONS

Key

X = Violations, no Specialties
B = Violations & Specialty
S = Same Viol./Specialty
Z = Pending Determination
O = No Viol or Specialty foundI = No insurance only
C = CA Schedule Violation
H = HPV

* = Class I only

Class of Violation	Acceptable Codes							
	GWM	C/PC	Fin.Res	Pt. 8	Compl.Sch	Manifest	Land-Ban	Other
I						O	O	X
II						O	O	O
	X	X	X	X	X	X	X	X
	S	S	S	S	S	S	S	S
	Z	Z	Z	Z	Z	Z	Z	Z
	O	O	O	O	O	O	O	O
	H	H	I*	H	C	H	H	H
			B*		B			
			H		H			

9a. Viol Comment: Hazardous Waste Determination and Labelling Requirement

7. ENFORCEMENT ACTIONS:

Class	Area of Viol./rel.	Type (use code)	Date Action Taken	Compliance Dates Scheduled	Actual	Penalty Assessed	Collected	Resp. Agency (use code)
		04						
		04						

Codes for Types of Enforcement Actions:

03 = Warning Letter
04 = Admin. Complaint
05 = Final Admin. Order
10 = Informal

11 = Filed Civil Action
12 = Filed Criminal Action
18 = Civil Referral to AG/DOJ
19 = Final Judicial Order

15 = CA Init. Admin Order
16 = CA Final Admin Order
21 = Notice of Non-Comp
22 = FFCA
23 = Fed. Fac. Referral to HQ

Resp Agency Codes
E = EPA
S = State
X = EPA Oversight

10. Enforc. Comment:



STATE OF WEST VIRGINIA
DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES
WASTE MANAGEMENT SECTION

1356 Hansford Street
Charleston, West Virginia 25301
Telephone (304)348-5929

July 22, 1991

GASTON CAPERTON
Governor

J. EDWARD HAMRICK III
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ANN A. SPANER
Deputy Director

Frank H. Brosius, General Manager
Coyne Textile Services
1111 Vernon Street
Huntington, West Virginia 25704

Dear Mr. Brosius:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by representatives of the Chief of the Waste Management Section. This report is based on the inspection conducted on June 25, 1991.

Accompanying this report you will find a **Notice of Violation (NOV)** for those violations detected during the course of this inspection. A copy of this NOV has been forwarded for penalty calculation by the Assessment Officer. In addition, the Enforcement Office of this Section and the United States Environmental Protection Agency have been notified so that these violations have become a permanent addition to the compliance history of this facility.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact this office at (304) **348-5989**.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Michael Dorsey".

H. Michael Dorsey, Assistant Chief
Compliance Monitoring/Enforcement

HMD/kw
Enclosures

cc: Assessment Office for Civil Penalties
Janemarie Newton, U.S. EPA Region III
Civil and Administrative Enforcement Unit
Chris Gatens, Inspector
File

EVALUATION - VIOLATION - ENFORCEMENT FORM

HANDLER

ID Number WV D052574753 Date Submitted 062391

Handler Name

Coyne Textile Services

Street

1111 Vernon Street

City

Huntington, WV 25704

EVALUATION

Add ☒ Change ☐ Delete ☐

Date 062591 Number ... Agency S Type CEI Reason ... Branch ... Person CMG

Areas of Evaluation (E - Evaluated, NE - Not Evaluated, NA - Not Applicable)

GGR	E	GSD	E	TUD	NA	DNR	NA	DTR	NA	DIN	NA	DCR	NA
GHR	NA	GOR	NA	TCR	NA	DGV	NA	DSI	NA	DTT	NA		NA
GPT	E	GLS	E	DGS	NA	DCL	NA	DNP	NA	DCH	NA	CAS	NA
GRR	NA	TGR	NA	DPP	NA	DFR	NA	DLT	NA	DPS	NA	FEA	NA
GSC	NA	TMR	NA	DCP	NA	DNC	NA	DLF	NA	DLS	NA		NA

Comments

VIOLATION

Add ☒ Change ☐ Delete ☐

Agency S Number ... Area GGR Class ... Regulation Type SR Regulation Citation §47-35-6.12 - Hazardous Waste Determination

Date Determined 062591 Priority ... Branch ... Person CMG Returned to Compliance Scheduled 080291 Actual ...

Comments

VIOLATION

Add ☒ Change ☐ Delete ☐

Agency S Number ... Area GPT Class ... Regulation Type SR Regulation Citation §47-35-10.13.C - Labeling Requirements

Date Determined 062591 Priority ... Branch ... Person CMG Returned to Compliance Scheduled 080291 Actual ...

Comments

VIOLATION

Add ☒ Change ☐ Delete ☐

Agency S Number ... Area GPT Class ... Regulation Type SR Regulation Citation §47-35-10.13 - Accumulation Time

Date Determined 062591 Priority ... Branch ... Person CMG Returned to Compliance Scheduled 080291 Actual ...

Comments

VIOLATION

Add ☐ Change ☐ Delete ☐

Agency ... Number ... Area ... Class ... Regulation Type ... Regulation Citation ...

Date Determined ... Priority ... Branch ... Person ... Returned to Compliance Scheduled ... Actual ...

Comments

INSPECTION FACT SHEET

COMPANY NAME: Coyne Textile Services

I. D. #: WVD052574753

MAILING ADDRESS: 1111 Vernon Street
Huntington, WV 25704

TYPE OF FACILITY: Small
Quantity Generator

LOCATION: Same

COUNTY: Wayne (099)

COMPANY CONTACT: Frank H. Brosius
General Manager

HANDLING CODES: S01

PHONE: 304/429-5585

PURPOSE: Compliance Evaluation Inspection.

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act; Chapter 20-5E; 40 CFR, Parts 260-265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled; where it goes)

Notified for D001 - Waste Petroleum Naphtha
F002 - Waste Perchloroethylene

DATE INSPECTED: June 25, 1991

X VIOLATIONS

INSPECTORS: (1) Chris Gatens

 NO VIOLATIONS

(2) Tom Fisher

(3) Charlie Morris

DATE PREPARED: June 28, 1991

PREPARED BY: Chris Gatens

COMPLIANCE EVALUATION AND COMPLAINT INVESTIGATION

RE: Coyne Textile Service
111 Vernon Street
Huntington, West Virginia 25704
EPA Identification Number: WVD052574753

DATE INSPECTED: June 25, 1991

INSPECTED BY: Chris Gatens, WV DNR/WMS
Tom Fisher, WV DNR/WMS
Charlie Morris, WV DNR/WMS

PREPARED BY: Chris Gatens

On this date the above West Virginia Division of Natural Resources personnel conducted a Compliance Evaluation Inspection and Complaint Investigation of Coyne Textile Services in Huntington, West Virginia. Upon arrival for this inspection at 1:20 P.M., we met with Plant Manager, Charlie Galloway. Mr. Galloway was advised of our authority and the reason for the inspection. Also present during the inspection was Mike Lewis from the Huntington Sanitary Board. For several months, Mr. Lewis has received complaints from the local residents concerning solvent-type odors in the city sewer system. He contacted the WV DNR about the matter.

Coyne Textile Services of Huntington, WV operates a textile leasing and rental service. Products offered for rental, or leasing include uniforms, mops, floor mats, and shop towels. The company supplies its customers with clean items and returns to the facility with dirty ones for laundering or cleaning. Coyne is classified as a small quantity generator of hazardous waste and has an EPA identification number. The facility has notified for the generation of waste petroleum naphtha (D001) and waste perchloroethylene (F002).

A physical inspection of the facility was conducted. The laundering area and wastewater pretreatment system were viewed. A strong acetone-type odor could be detected in the area. The source of the odor was several large laundry totes containing soiled and solvent soaked rags. Many of the soiled rags were covered with printing ink, grease, and auto paint.

The delivery truck maintenance area was viewed next. The shop operates a 16 gallon parts cleaning basin that generates waste petroleum naphtha (D001). The unit is cleaned out by Safety-Kleen on 6 week intervals. Safety-Kleen also picks up the waste oil from service work conducted in the shop.

Several 55 gallon drums were noted opposite the truck maintenance area. Six black drums were labelled as "Sludge" and determined to contain perchloroethylene sludge from a discontinued dry cleaning operation. Six more drums were found to contain perchloroethylene and water. According to the facility representative the perchloroethylene sludge/water was generated when the drum cleaning operation was shut down in December of 1990. No hazardous waste labels or accumulation start dates were present on any of the twelve drums. Also present in the area were 10 drums containing old solidified Sherwin Williams, "Dryfall, Semi-Gloss" white paint. MSDS information was not available for the paint at the facility.

We met in the office to discuss problems at the facility. The facility officials were advised of the hazardous waste management regulations for container storage and labeling. A copy of this report and the violations will be submitted to the Assessment Officer. At this time,

we thanked the facility representatives for their cooperation and departed the facility.

COMPLIANCE EVALUATION

Refer to the Notice of Violation.

CIVIL ADMINISTRATIVE PENALTY
REFERRAL FORM

Facility: Coyne Textile Services
Location: 1111 Vernon Street Huntington WV 25704
I. D. #: WVD 0525 74753
Citation: § 47-35-10.1 b.c
Date of NOV: 7-8-91

I. Deviation from Requirements

- (1-3) -- The violator had completed nearly all requirements in question. However, there were some aspects of the requirement which were clearly not accomplished. Or, the requirement was complete in most, but not all, areas of the facility.
- (4-6) -- The violator had completed approximately one-half of the requirement of the regulation in question. Or, the requirement was completed in approximately one-half of the areas of the facility.
- (7-9) -- The violator has completed almost none of the requirements of the regulation in question. However, some aspects of the requirement clearly were accomplished. Or, the requirement was incomplete in most but not all areas of the facility.
- (10) 10 -- The violator had not completed any of the requirements of the regulation in question. Or, the requirement was incomplete in all areas of the facility.

II. Potential for Harm

- (1-3) -- Violation is of an administrative nature and could not result in a potential for harm to human health or the environment.
- (4-6) -- Violation is of an administrative or physical nature and may result in a minor potential for harm to human health or the environment.
- (7-9) 7 -- Violation is of an administrative or physical nature and may result in a moderate potential for harm to human health, or the environment.
- (10) -- Violation is of an administrative or physical nature and may result in a major potential for harm to human health, or the environment.

III. Negligence/Good Faith

- (1) -- The violation is not the result of negligence and the violator expended all possible effort to comply with the requirements in question, or the violator has completed all actions to correct the violation.
- (2-4) 4 -- The violation is the result of an oversight by the violator and could have been avoided if a more conscientious effort had been made in the operation of the facility, or the violator has begun but not completed current actions to correct the violation.
- (5-7) -- The violation is obvious and a result of a lack of reasonable care by the violator, or the violator has taken inadequate action to correct the violation.
- (8-10) -- The violation is the result of a complete disregard for the requirement in question, or the violator failed to respond to previous enforcement action, pertaining to the same requirement.

IV. Type of Facility

 Generator (G) Treatment, Storage, Disposal (TSD)
✓ Small Quantity Generator (SQG) Conditionally Exempt SQG (CESQG)

Adjustment Factor .75

V. History of Non-Compliance

0 Number of final Administrative Orders
0 Number of Civil Actions
0 Number of Criminal Convictions

DIVISION OF NATURAL RESOURCES
Waste Management Section

3/7/9

CIVIL ADMINISTRATIVE PENALTY
REFERRAL FORM

Facility: Coyne Textile Services
Location: 1111 Vernon Street, Huntington, WV 25704
I. D. #: WVDC52574753
Citation: § 47-35-10.1.3
Date of NOV: 7-8-91

I. Deviation from Requirements

- (1-3) -- The violator had completed nearly all requirements in question. However, there were some aspects of the requirement which were clearly not accomplished. Or, the requirement was complete in most, but not all, areas of the facility.
- (4-6) -- The violator had completed approximately one-half of the requirement of the regulation in question. Or, the requirement was completed in approximately one-half of the areas of the facility.
- (7-9) 9 -- The violator has completed almost none of the requirements of the regulation in question. However, some aspects of the requirement clearly were accomplished. Or, the requirement was incomplete in most but not all areas of the facility.
- (10) -- The violator had not completed any of the requirements of the regulation in question. Or, the requirement was incomplete in all areas of the facility.

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- (1-3) -- Violation is of an administrative nature and could not result in a potential for harm to human health or the environment.
- (4-6) -- Violation is of an administrative or physical nature and may result in a minor potential for harm to human health or the environment.
- (7-9) 7 -- Violation is of an administrative or physical nature and may result in a moderate potential for harm to human health, or the environment.
- (10) -- Violation is of an administrative or physical nature and may result in a major potential for harm to human health, or the environment.

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- (2-4) -- The violation is the result of an oversight by the violator and could have been avoided if a more conscientious effort had been made in the operation of the facility, or the violator has begun but not completed current actions to correct the violation.
- (5-7) 5 -- The violation is obvious and a result of a lack of reasonable care by the violator, or the violator has taken inadequate action to correct the violation.
- (8-10) -- The violation is the result of a complete disregard for the requirement in question, or the violator failed to respond to previous enforcement action, pertaining to the same requirement.

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✓ Small Quantity Generator (SQG) Conditionally Exempt SQG (CESQG)

Adjustment Factor .75

V. History of Non-Compliance

0 Number of final Administrative Orders
0 Number of Civil Actions
0 Number of Criminal Convictions

DIVISION OF NATURAL RESOURCES
Waste Management Section

NOTICE OF VIOLATION

DATE: 7-8-91

TIME: 10:00am

ISSUED TO: Coyne Textile Services

EPA I.D.#: WVD052574753

FACILITY MAILING ADDRESS: 1111 Vernon Street, Huntington, WV 25704

FACILITY REPRESENTATIVE: Frank H. Brosius, General Manager

On the date and time specified, an authorized agent of the Chief of the Waste Management Section conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 20, Article 5E and/or an Order or Permit issued pursuant to §20-5E. During that inspection the following violation(s) were detected:

1. A. (Regulation) §47-35-6.1.2 Hazardous Waste Determination
B. (Facts) The facility has failed to make a hazardous waste determination of waste material in 55 gallon drums.
2. A. §47-35-10.1.3.C Small Quantity Generator storage requirements.
B. The facility has failed to label drums of hazardous waste with an accumulation start date and the words "Hazardous Waste".
3. A. §47-35-10.1.3 - Accumulation Time
B. The facility has stored ~~1111~~ hazardous waste on site longer than 180 days.
4. A. _____
B. _____

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial action(s):

1. Upon receipt of this notice make a proper hazardous waste determination of waste material in drums and all waste on site
2. Upon receipt of this notice label hazardous waste drums with the words "Hazardous Waste" and the accumulation start dates.
3. Upon receipt of this notice make arrangements to dispose of all hazardous waste and respond to this office within 25 days explaining that remedial actions have been completed.

A copy of this Notice of Violation will be forwarded to the Enforcement Office of the Waste Management Section. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §20-5E-16(a).

Issued By: Christopher M. Latens

Title: Environmental Inspector